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1 CHRIS TREPAL: My name is Chris Trepal, I'm with the Earth Day Collision here on local environmental, education, advocacy organization. And before I start my prepared comments, I would like to add our request to those of Mayor White to request a 180 day extension to the comment period. We very much appreciate that seven days ago DOE released, for the first time, a map showing the potential transportation routes in Ohio. But the end of the comment period is just a few days away. And, although Wendy opened the meeting saying that all of the answers to our questions were contained in the 1,500 page EIS, the devil is really in the details. And there are no specifics, that I could see, for routes for types and volumes of waste and impacts to my specific community.

2 So I think that we need to ask DOE to go back to the drawing board and give us some real meat. This is our only opportunity to comment. I live in the City of Lakewood, Ohio, we have more grade crossings per mile than any city in the country. In 1998 there were 136 train and car accidents with 13 fatalities in Ohio. Ohio is the state with the densest population per square miles to railroad miles. Ohio's rail lines carry more traffic that those of 46 other states. There's a train accident or incident every 90 minutes and a derailment in which hazardous materials are released occurs on the average of every two weeks.

Vital rail safety, such as traffic control mechanisms date back to the 1930s and we're talking about pairing our current transportation and rail with nuclear waste. In 1986 there was a high speed impact railway accident, derailment and fire involving multiple chemicals at Miamisburg, Ohio. In 1989 there was a derailment and fire in Akron and those hit very close to home. I feel the DOE must evaluate these real life, Ohio accident conditions in relationship to the casks that will carry the waste through our city.

80 percent of the nation's public railroad crossings remain unprotected by lights and gates. Ohio leads the nation in the number of grade crossings with neither lights nor gates. However, over 50 percent of accidents in Ohio occur at crossings that do have lights and gates. And what does all this mean when you're going to send nuclear material right through my neighborhood?

3 The 1985 DOE report that says that an accident involving one rail cask carrying high-level waste could result in the release of material to the environment costing about \$620 million if it occurred in a rural setting and between \$9 and \$14 billion in an urban area. I really would like to know what is the risk for my hometown of 60,000 people? It's really not acceptable that you have averaged the risk over 50 million people. I would like to know what the 60,000 person risk is to my hometown.

3 Regarding highways, a recent study from the Texas Transportation Institute of traffic in greater Cleveland and 60 other metropolitan areas, found that traffic jams are getting more frequent and severe. In 1997, 50 percent of traffic was congested and freeways are more crowded. The number of miles traveled daily on freeways rose 66.5 percent from 1982 to 1997. DOE must account for non-accident exposures that will become routine when casks are trapped in heavy traffic with other vehicles for long time periods, such as those I experience on my way to work every morning. Despite reports there have been high-level radioactive waste transportation accidents.

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Between 1957 and '64, there were 11 accidents/incidents involving nuclear fuel shipments that resulted in radioactive releases including both leaking rail and truck casks. Between 1971 and '90, there were six accidents and 47 incidents involving nuclear fuel with no releases. Because of the amount of waste shipped in the first full year projected at Yucca Mountain will exceed the total amount of shipping that's gone on in the past year. And DOE has predicted accidents.

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Finally, to conclude additions to concerns about packaging degradation. We must raise concerns about degraded fuel. DOE must study the fuel from the Perry plant and other nuclear power plants that the fuel rods are leaking radioactivity. According to some scientists, this leaking fuel poses a threat to public health and safety and violates operating licenses. This fuel has been attributed to the debris fretting or to undetected manufacturing defects. The fuel has pin point holes, bad end cap welds and axial cracks. GE believes that the root cause of the failures is undetected manufacturing defects, possibly exacerbated by Perry's operating practices. What's going to happen when this fuel hits the road? And we really feel that DOE evaluate fuels from such a plant for undetected defects.